



The
Plastics
Industry
Trade
Association

8EHQ - 1097-13959¹⁹⁵²

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8EHQ-97-13959

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Attention: TSCA 8(e) Coordinator

Re: Enforceable Consent Agreement for Alkyl Glycidyl Ether C₁₂ - C₁₃
Docket No. OPPTS-42185; Additional results from Neurotoxicity
Study

Dear Sir or Madame:

The Society of the Plastics Industry, Inc. (SPI),¹ on behalf of its Epoxy Resin Systems Alkyl Glycidyl Ether Task Force, is submitting this letter as a supplement to the data reported on June 18, 1997 under Section 8(e) of the Toxic Substances Control Act (TSCA). The original 8(e) submittal reports data generated during a study conducted on a formulation of alkyl glycidyl ether. The following information is being submitted by SPI pursuant to current guidance issued by the Environmental Protection Agency (EPA) indicating EPA's interpretation of Section 8(e) of TSCA. Neither SPI, nor any individual member, has made a determination as to whether a significant risk of injury to health or the environment is actually presented by the findings.

Supplemental Findings

In addition to changes in the flash evoked response (FEP) of mid- and high-dose male rats after 14 weeks of dermal exposure to AGE, statistical analyses indicated that high-dose female rats also had alterations in the FEP, but in the opposite direction. Although statistical significance occurred only at the male FEP-C early components, and at female FEP-C and FEP-V mid-latency components, visual examination of the waveforms indicated a general tendency for male mid- and high-dose waveforms to be smaller and

The Society
of the Plastics
Industry, Inc.

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1801 K Street, NW¹ SPI is a trade organization of more than 2,000 members representing all segments of the plastics industry in the United States. SPI's operating units and committee are composed of resin manufacturers and other raw materials suppliers, distributors, machinery manufacturers, plastics processors, moldmakers, and other industry-related companies and individuals.

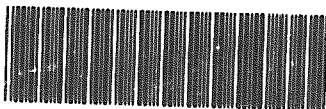
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female high-dose waveforms to be larger (see table). As in male rats, examination of FEP waveforms indicated a possibility that the 'source' of the amplitude differences was early in visual processing, such as retina or early visual pathway. Because of the uncertainty of the mechanism of the FEP differences, and because early visual processing in albino rats is known to be different than in pigmented animals, the toxicologic significance of these FEP differences is unknown.

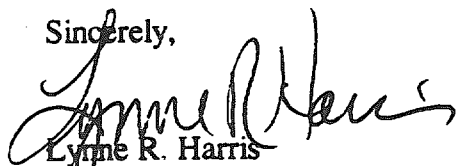
SUMMARY OF FLASH EVOKED POTENTIAL CHANGES

Waveform	Component	Males	Females
<i>FEP-V (visual cortex)</i>	Early waves	smaller (not sig)	no difference
	Mid-latency	smaller (not sig)	larger (significant)*
<i>FEP-C (cerebellar cortex)</i>	Early waves	smaller (significant)	larger (not sig)
	Mid-latency	smaller (not sig)	larger (significant)*

* new information

Please call me if you require additional information at (202) 974-5217.

Sincerely,



Lynne R. Harris

Staff Director

Epoxy Resin Systems Task Group

cc: Epoxy Resin Systems Alkyl Glycidyl Ether C₁₂-C₁₃ Task Force
Epoxy Resin Systems Alkyl Glycidyl Ether C₁₂-C₁₃ Toxicology Task Force

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